

June 30, 2015

VIA FACSIMILE

Honorable Cathy L. Waldor, U.S.M.J.
United States District Court for the District of New Jersey
Courtroom MLK5D
Martin Luther King Building and U.S. Courthouse
50 Walnut Street Room 4C
Newark, New Jersey 07101

Re: *Casagrand, et al. v. Gannett Co., Inc. et al.*
U.S. District Court, District of New Jersey, No. 2:14-cv-00022

Dear Judge Waldor:

Plaintiffs Richard Casagrand and Dylan Schlossberg, along with Defendants Gannett Co. Inc. and Marketing Plus, Inc. (collectively, the “Parties”) write to update the Court on the status of their settlement discussions.

On April 7, 2015, the Parties submitted a joint letter informing the Court that they had agreed to attend a mediation before the Honorable Lane Phillips (ret.) of Phillips ADR, with a date to be determined, and requesting that the Court stay discovery in this matter in order to conserve the resources of the Parties and the Court. (Dkt. 46.) As a result, on April 10, 2015, the Court entered an order (i) staying this matter until June 30, 2015, and (ii) instructing the Parties to submit a joint report regarding the status of the Parties’ mediation efforts by no later than that same time. (Dkt. 47.) Shortly thereafter, the Parties scheduled mediation with Judge Phillips for June 26, 2015, to be held at the New York offices of Gannett’s counsel.

Although the Parties had every intention of proceeding with the mediation as scheduled, the Parties ultimately agreed to continue the mediation an additional thirty (30) days, so that the Parties could exchange additional information relevant to their settlement efforts. Additionally, given Judge Phillip’s limited availability and travel schedule, the Parties agreed that they would select a different mediator.

The Parties are continuing with their settlement efforts and are currently considering additional mediators. As such, and in effort to continue to conserve the resources of the Parties and the Court, the Parties respectfully request that the Court continue the stay of discovery in this matter an additional sixty (60) days, until August 29, 2015, at which point the Parties will submit a further joint report regarding the status of their mediation efforts. Alternatively, should the Court have any questions about the instant request, the Parties respectfully request a brief telephone conference with the Court to discuss these issues and the litigation moving forward.

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Respectfully submitted,

/s/ Eve-Lynn J. Rapp
Attorney for Plaintiffs

Respectfully submitted,

/s/ Matthew J. Fedor
Attorney for Gannett Co., Inc.

Respectfully submitted,

/s/ Elliott Pell
Attorney for Marketing Plus, Inc.